

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

AYA HEALTHCARE, INC.,

Plaintiff,

v.

RALPH DE LA TORRE and MEDICAL
PROPERTIES TRUST, INC.,

Defendants.

Case No. 3:24-cv-00390-B

STIPULATION TO STAY ACTION IN ITS ENTIRETY

Plaintiff Aya Healthcare, Inc. (“Plaintiff”), on the one hand, and Defendants Ralph de la Torre and Medical Properties Trust, Inc. (“MPT” and, together with Dr. de la Torre and Aya, the “Parties”), on the other hand, hereby stipulate and agree as follows:

WHEREAS, on February 19, 2024, Plaintiff commenced the above-captioned action (the “Action”) by filing the initial Complaint [Docket No. 1];

WHEREAS, on February 20, 2024, Plaintiff filed the operative First Amended Complaint [Docket No. 4] (the “FAC”);

WHEREAS, on May 3, 2024, Dr. de la Torre and MPT timely filed their respective answers to the FAC [Docket Nos. 28 & 30];

WHEREAS, on May 6, 2024 (the “Petition Date”), Steward Health Care System LLC and certain of its affiliates (collectively, “Steward”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas. Steward’s chapter 11 cases are being jointly administered under lead Case No. 24-90213 (CML); and

WHEREAS, the Parties have conferred, and they acknowledge and agree that as of the

Petition Date this Action is subject to the automatic stay under section 362(a) of the Bankruptcy Code.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties, by and through their counsel of record, that:

This Action is stayed in its entirety pending further order of this Court.

[Signature pages follow]

Dated: May 28, 2024

/s/ Elizabeth M. Chiaviello

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CERTIFICATE OF SERVICE

I certify that on May 28, 2024, the foregoing document was filed and served using the Court's ECF system.

/s/ Elizabeth M. Chiaviello
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